

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF WEST VIRGINIA  
Wheeling Division**

**DIANA MEY,  
CRAIG CUNNINGHAM,  
STEWART ABRAMSON, and  
JAMES SHELTON,  
individually and on behalf of a class of all  
persons and entities similarly situated,**

**Plaintiffs,**

**vs.**

**Case No. 5:17-cv-00179-JPB  
Judge Bailey**

**DIRECTV, LLC;**

**and**

**ADAM COX;  
AC1 COMMUNICATIONS;  
IQ MARKETING 2, CORP., d/b/a PACIFICOM;  
MICHAEL ASGHARI;  
NAS AIR LOGISTICS;  
JOHN MATTHEWS;  
BIRJU, LLC;  
PIC SIX, LLC;  
MYLAN JOHNSON GROUP;  
XCITE SATELLITE, LLC;  
EXACT ESTIMATING, LLC;  
CDS V1, LLC d/b/a COMPLETE DIGITAL SOLUTIONS;  
KREATAMOTIVE LLC;  
EXPLOSIVE SALES MARKETING GROUP, INC.,**

**Defendants.**

**JOINT MOTION REQUESTING THE  
COURT TO ENTER PROTECTIVE ORDER**

Plaintiffs Diana Mey, Craig Cunningham, Stewart Abramson and James Shelton, and defendants DIRECTV, LLC;<sup>1</sup> ACI Communications; and Xcite Satellite, LLC, by their counsel,

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<sup>1</sup> The case is currently stayed as to DIRECTV, but DIRECTV joins this Motion as it remains a party and hence, may receive confidential materials that warrant protection.

appear before the Court to request entry of the proposed Protective Order filed with this Joint Motion. The proposed Protective Order is the sample protective order found on the website of the Northern District of West Virginia's website, with two changes: (1) modifying the "Confidential Information" definition in paragraph 2(a) so as to include personal information of third parties (e.g., customer account information), and (2) modifying the destruction of copies provision of paragraph 23 to exclude materials that may have been copied to back-up tapes in the ordinary course.

Dated: January 30, 2019

Respectfully submitted by:

s/ Sharon F. Iskra

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